



**CONTRA COSTA
WATER DISTRICT**

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January 20, 2004

Leslie Grober
Regional Water Quality Control Board, Central Valley
11020 Sun Center Drive #200
Rancho Cordova, CA 95670-6114

**RE: Proposed Amendments to the Sacramento – San Joaquin Rivers Basin Plan
for the Control of Salt and Boron Discharges into the San Joaquin River**

Dear Mr. Grober:

Contra Costa Water District (CCWD or District) appreciates the opportunity to comment on the Central Valley Regional Water Quality Control Board's Proposed Amendments to the Sacramento – San Joaquin Rivers Basin Plan for the Control of Salt and Boron Discharges into the San Joaquin River (Proposed BPA). CCWD is a municipal and industrial water supplier that relies on the Sacramento – San Joaquin Delta for its drinking water supply. CCWD has a long history of participation in salinity issues in the Sacramento – San Joaquin Delta and would support solutions that reduce salinity in the San Joaquin River without redirecting those impacts to municipal water suppliers downstream. CCWD has a long-standing opposition to the construction of an out-of-valley San Joaquin Valley drain which would deliver highly saline water to the vicinity of CCWD water supply intakes.

Contra Costa Water District supplies water to over 450,000 people in Contra Costa County in northern California. The primary source of water for is surface water diverted from the Sacramento-San Joaquin Delta. Water is delivered to CCWD's raw water municipal and industrial customers, stored in the Los Vaqueros Reservoir, or treated and delivered to CCWD's treated water customers.

CCWD is encouraged that the Central Valley Regional Water Quality Control Board is addressing the problem of consistent exceedances of salinity standards in the lower San Joaquin River. CCWD offers the following comments for your consideration:

Drinking water quality in the Delta is most impaired in the late fall months (October through the first seasonal rains), and often requires releases from upstream reservoirs to meet governing standards. This is the same period of time when the Proposed BPA assumes the most "real-time assimilative capacity" in the San Joaquin River.

Leslie Grober, CVRWQCB

CCWD Comments on the Proposed BPA for Salt and Boron in the San Joaquin River

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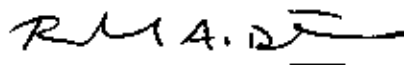
CCWD requests that the Regional Board coordinate with the State Water Resources Control Board on this issue, and consider using the status of the Delta as a trigger for real-time management so that Vernalis salinity is not allowed to increase when the Delta is in balance under SWRCB Decision 1641 (D-1641).

There is little to no discussion of other activities within the Delta and their relationship to this TMDL. For example, the California Bay-Delta Program's Drinking Water Quality Program's goal is to improve drinking water quality in the Delta (including salinity reduction) over the life of the program, it is not clear how the use of real-time load allocations, which degrade the water quality of the Delta, impacts the ability to achieve this goal of continuous improvement. D-1641 also requires the study of recirculation as a means to reduce the salinity of the lower San Joaquin River. CCWD encourages the Regional Board to adopt a Basin Plan Amendment which will result in the permanent reduction of salinity and boron in both the San Joaquin River and the Delta.

CCWD is also encouraged that the Regional Board intends to establish additional water quality objectives upstream of Vernalis. These compliance locations will lead to better identification and control of the significant sources of contamination and facilitate improvement in water quality along the full length of the San Joaquin River, not just Vernalis.

If you have any questions regarding these comments, please contact me at (925) 688-8187 or rdenton@ccwater.com or Lisa Holm at (925) 688-8106 or lhholm@ccwater.com.

Sincerely,



Richard A. Denton

Water Resources Manager

RAD/LMH